



**COMMONWEALTH of VIRGINIA**  
**Office of the Attorney General**

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Attorney General

June 19, 2018

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The Honorable David K. Paylor, Director  
Virginia Department of Environmental Quality  
1111 East Main Street  
Richmond, Virginia 23219

Re: Water Withdrawal Reporting Regulations (9 VAC 25-200, *et seq.*)

Dear Director Paylor:

I have reviewed the above-referenced regulations. It is my opinion that the State Water Control Board has the statutory authority for promulgation of the regulations pursuant to Va. Code § 62.1-44.38 and further that the regulations do not exceed the authority to regulate granted as set out in the enabling legislation.

This certification addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the regulations.

If I may be of any further assistance to you relating to this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "David C. Grandis".

David C. Grandis  
Assistant Attorney General